  
DAN WARD, PRESIDENT  
P.O. Box 863  
Clarkton, NC 28433  
Telephone: (910) 647-0353

SAMMY HOWELL, VICE-PRESIDENT  
715 Statesville Road  
Como, NC 27818  
Telephone: (252) 398-3361

OPP-2004-0159  
MIKE BELCH, SECRETARY  
13310 US 158 Highway  
Conway, NC 27820  
Telephone: (252) 398-5768

DONNIE WHITE, TREASURER  
2464 Spring Green Road  
Williamston, NC 27892  
Telephone: (252) 798-2691

# North Carolina Peanut Growers Association, Inc.

ROBERT R. SUTTER  
Chief Executive Officer

P. O. BOX 8  
NASHVILLE, NORTH CAROLINA  
27856-0008

Telephone  
(252) 459-5060  
(252) 459-5067  
FAX  
(252) 459-7396  
E-MAIL  
sutter@aboutpeanuts.com

July 29, 2004

Public Information and Records Integrity Branch (7502c)  
Office of Pesticide Programs  
United States Environment Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

AUG 10 2004

*Postmark 8/2/04*

Re: Docket ID Number OPP-2004-0159

The North Carolina Peanut Growers Association submits these comments on the U.S. Environmental Protection Agency's "Metam Sodium Availability of Risk Assessments" as published in the Federal Register dated June 2, 2004. Peanut Production in the state of North Carolina is totally dependent on the unencumbered use of metam sodium as a soil fumigant. It is estimated that at least 75% of the 105,000 peanut acres planted in North Carolina are treated. There are no alternatives. Without metam sodium, planting would be ill-advised due to the prevalence of diseases such as cylindrocladium black rot for which metam is used to prevent. For years, our researchers have conducted trials to determine the most effective, safe and cost-efficient use rates and manner of application. The profile showing the use of metam sodium in our state will be submitted and I hope EPA will take the importance of this use data into consideration. In addition, buffer zones have been mentioned. North Carolina's producers cannot operate with any type of buffer zones. In our minds, it has not been proven that these are necessary.

The North Carolina Peanut Growers Association fully supports the comments on the Risk Assessment which will be submitted to EPA by the Metam-Sodium Alliance.

It is very concerning to peanut growers in this state that a revised Risk Assessment will be published while EPA is undergoing further reviews on metam. This could be very misleading to the public, the news media, or anyone else who happens upon it. This organization has participated in meetings, briefings, and conference calls on this subject matter. On every occurrence, EPA officials have stressed that all of their findings are very preliminary and that this is a "work in progress." We have heard that, EPA has said that, but efforts must be made by EPA to stress this point in the Revised Assessment.

The farming community and general public rely on EPA to act only on proven scientific evidence and methodologies. We believe it would be unfair to place the same restrictions, if any are contemplated, on the use of metam across all crops. Our application strategy in peanut

*"For Size, Quality and Flavor too, the NORTH CAROLINA-VIRGINIA TYPE is the PEANUT for you"*  
Web Site <http://www.aboutpeanuts.com>

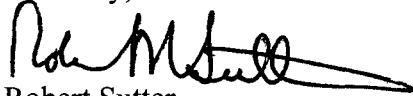
*1/2*

production uses extremely low rates and places the product 8 to 10 inches in soil beneath bedded rows. This minimizes concerns over volatility and surface runoff. This use rate and method of application should command a different model from that of other use rates and methods of application. Each use pattern should present a completely different risk assessment. We ask that EPA use only proven scientific methods and factual information in assessing any risks posed by our use of metam in peanut production.

We urge you to correct the discrepancies in the preliminary Assessment which have continually been brought to your attention. Producer livelihoods are hanging in the balance, and now is the time for EPA to make sure they notify the public and scientific community that the Revised Assessment is still preliminary and that further scientific-based information must be developed by the agency.

Thank you for allowing us to make these comments on behalf of the Board and membership of the North Carolina Peanut Growers Association.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Sutter', with a long horizontal flourish extending to the right.

Robert Sutter  
Chief Executive Officer